

R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington, DC 20036

202 429 3125
202 293 0561 fax
Email hhaney@qwest.com



November 20, 2002

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for
Authorization to Provide In-Region, InterLATA
Service in the States of Colorado, Idaho, Iowa,
Montana, Nebraska, North Dakota, Utah,
Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing at the request of Commission staff regarding Qwest’s performance under BI-3A (Billing Accuracy) in Washington in September.

Qwest already described why it did not meet the parity standard for BI-3A in Washington in August.¹ Qwest did not meet the parity standard in Washington in September for the same reason. Specifically, Qwest lowered the rates it charges CLECs for certain services and performed true-up adjustments to the effective date of the changed rate. Although Qwest implemented the rate reduction in August, some of the true-ups actually took place in September because of certain CLECs’ billing periods. This affected Qwest’s ability to achieve parity in both months. Again, this was a one-time rate reduction that benchmarked UNE and Resale rates, not a systemic billing failure on Qwest’s part.

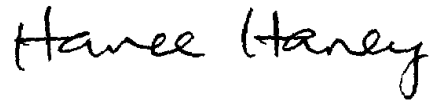
Notwithstanding the above-discussed misses, Qwest’s BI-3A performance has been exceedingly strong in Washington. With only minor exceptions, Qwest has provided CLECs with accurate bills under BI-3A 95% of

¹ See Qwest III 11/08/02b Ex Parte.

the time in the past year, a level of performance the Commission approved in Bell South's recent five-state application.²

The twenty-page limit does not apply to this filing.

Respectfully submitted,

A handwritten signature in black ink that reads "Hamee Haney". The signature is written in a cursive, slightly slanted style.

cc: E. Yockus
M. Carowitz
G. Remondino
J. Myles
R. Harsch
J. Jewell
P. Baker
C. Post
P. Fahn
B. Smith
J. Stanley
C. Washburn
S. Vick
S. Oxley
J. Orchard

² See *Alabama, Kentucky, Mississippi, North Carolina, South Carolina 271 Order* at ¶ 174.